

# **EXHIBIT 4**

IN THE DISTRICT COURT OF ROGERS COUNTY  
STATE OF OKLAHOMA

JUN 17 2019

CATHI EDWARDS, COURT CLERK

DEPUTY

OCWEN LOAN SERVICING LLC,

Plaintiff,

v.

DEBRA JO TURNER A/K/A DEBRA  
TURNER; DEWAYNE MATHEWS;  
AND JOHN DOE, OCCUPANT,

Defendants.

Case No. CJ-2018-399  
Judge Sheila A. Condren

**OFFER OF JUDGMENT OF COUNTER-DEFENDANT OCWEN LOAN SERVICING  
LLC TO COUNTER-PLAINTIFFS DEBRA JO TURNER AND DEWAYNE MATHEWS**

To: Brad Barron  
The Barron Law Firm, PLLC  
P. O. Box 369  
Claremore, OK 74018  
*Counsel for Counter-Plaintiffs*

Pursuant to 12 O.S. §1101.1(B), Counter-Defendant Ocwen Loan Servicing LLC ("Ocwen"), without admitting any wrongdoing, offers to allow a money judgment to be entered against it in this action related to the individual counterclaims asserted against it by Counter-Plaintiffs Debra Jo Turner and Dewayne Mathews ("Counter-Plaintiffs") for the sum of Two-Thousand Five Hundred Dollars (\$2,500.00), plus reasonable attorneys' fees and/or costs incurred to date that may be otherwise recoverable by Counter-Plaintiffs, if any, under Oklahoma law. Counter-Plaintiffs have ten (10) days to accept this offer, or it shall be deemed rejected. In the alternative, Counter-Plaintiffs may file a counteroffer within ten (10) days.

Respectfully submitted,

/s/ Marc D. Cabrera

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**ATTORNEYS FOR OCWEN LOAN  
SERVICING LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 14th day of June 2019, a true and correct copy of the foregoing document was served on the following via regular and/or certified mail:

Brad Barron  
The Barron Law Firm, PLLC  
P. O. Box 369  
Claremore, OK 74018

/s/ Marc D. Cabrera

Marc D. Cabrera